

Exhibit A

Exhibit A

'194 Patent, claim 1

Claim Element	Allegations in the First Amended Complaint	Alleged Actors in the First Amended Complaint
1. An apparatus for providing recruitment information, comprising:	<p><u>Paragraph 51-55 of the First Amended Complaint:</u></p> <p>51. The Accused Instrumentalities comprise an apparatus for providing recruitment information. The infringing apparatus comprises servers, hardware, software, and a collection of related and/or linked web pages and mobile applications for providing recruitment information and services to individuals (including riders, job seekers, contractors, and employers) in the United States. The apparatus comprises a memory device, a processing device, and a transmitter. On information and belief, the Accused Instrumentalities comprise an apparatus built on the Amazon Web Services Platform, which is itself comprised of a multitude of components including the Lyft Multimodal Platform, Backend Platform Systems, Financial Applications, and the Lyft Website. Further on information and belief, the Lyft Platform relies on the Amazon DynamoDB, which is a database for delivering high performance at scale. Still further, on information and belief, Lyft leverages the Amazon Elastic Container Service for Kubernetes, and Amazon Lambda. See https://www.businesswire.com/news/home/20190226005070/en/Lyft-All-In-AWS.</p> <p>52. On information and belief, the infringing Lyft apparatus further comprises a data lake on the Amazon Simple Storage Service (Amazon S3), which leverages Amazon Redshift to analyze the vast amount of data Lyft stores on the Cloud. <i>Id.</i> On information and belief, the Accused Instrumentalities comprise an apparatus with multiple interconnected infrastructures, including but not limited to multiple data centers, including Amazon Web Services data centers located across the United States.</p>	Lyft

	<p>53. On information and belief, the infringing Lyft apparatus maintains and stores in memory realtime data with respect to the location of available (and soon-to-be available) Independent Contractors (<i>e.g.</i>, the drivers); the data includes at least information concerning the vehicle and present occupancy/capacity. <i>See, e.g.</i>, Fig. 1. On information and belief, the Lyft apparatus further maintains and stores in memory real-time data concerning the location and needs of the hiring entity or employer (<i>e.g.</i>, the rider). <i>See, e.g.</i>, Fig. 1. On information and belief, the infringing Lyft apparatus further filters all Independent Contractors by their respective GPS locations and capacities relative to the needs and location of the hiring entity (<i>e.g.</i>, the rider) in real-time; riders are then related to the most appropriate Independent Contractors. <i>See, e.g.</i>, Fig. 1. On information and belief, this “pairing” process is further informed by the estimated arrival time of the driver, as well as the mutual driver and rider preferences. <i>See, e.g.</i>, Fig. 1.; <i>see also</i> https://help.lyft.com/hc/en-us/articles/115012926847-How-drivers-and-passengers-are-paired.</p>	
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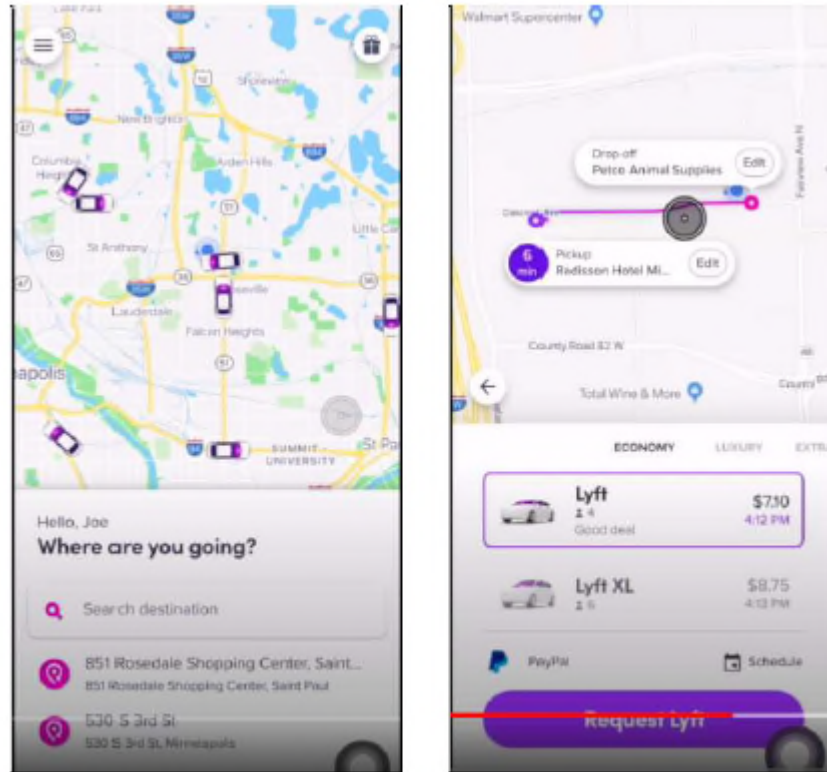


FIGURE 1

54. On information and belief, the infringing Lyft apparatus processes the relevant information as noted above in order to approximate arrival times, and delivers job notifications from a transmitter out to the Independent Contractors (electronically delivered to the mobile applications of the Independent Contractors) in order of priority until the opportunity is accepted. See, e.g., Figs. 1 and 2. Drivers are able to perform job search queries by going into “Driver Mode” to “Go Online” as an available contractor for hire.

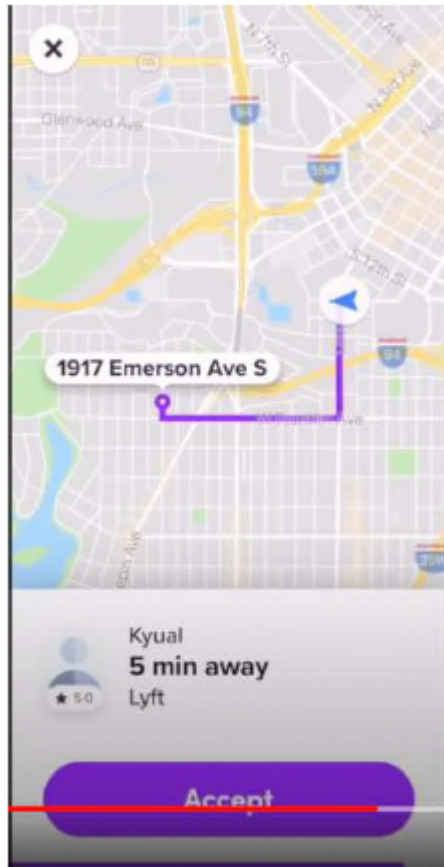


FIGURE 2

See How to Use Lyft Driver App Tutorial, at: <https://www.youtube.com/watch?v=a8n2--HlzDU>. See also, Every Feature in Lyft Apps Explained, at <https://www.ridesharingdriver.com/lyft-driver-andpassenger-app-features-explained/>.

	<p>55. On information and belief, the infringing Lyft apparatus comprises a multitude of databases to store the pertinent data, all of which are based on the Amazon Web Services Platform. On information and belief, the Lyft Accused Instrumentalities comprise multiple data centers housing memory devices, processing devices, receivers, and transmitters. On information and belief, such data centers are located Worldwide. <i>See above; see also</i> https://aws.amazon.com/about-aws/global-infrastructure/.</p>	
<p>a memory device for storing information regarding at least one of a job opening, a position, an assignment, a contract, and a project, and information regarding a job search request;</p>	<p><u>Paragraph 56 of the First Amended Complaint:</u></p> <p>56. The Lyft Accused Instrumentalities comprise a memory device, which stores information regarding at least job openings, positions, assignments, and/or projects, which take the form of ride requests from users of the Lyft apparatus. Further, the infringing Lyft apparatus stores information regarding job search requests, which take the form of driver availability data and request polling from such drivers. The infringing memory device, as described above, and on information and belief, is built on the Amazon Web Services Platform and comprises multiple data centers housing servers (i.e., memory devices, processing devices, receivers, and transmitters). On information and belief, as described above (see ¶¶ 51-55) such data centers are located Worldwide.</p>	Lyft
<p>a processing device for processing information regarding the job search request upon a detection of an occurrence of a searching event,</p>	<p><u>Paragraph 57 of the First Amended Complaint</u></p> <p>57. As described above (see ¶¶ 51-55), the Lyft Accused Instrumentalities comprise servers located at data centers across the United States which include processors (i.e., “processing devices”). On information and belief, such processors are programmed to processes the information concerning the job search request in real-time (i.e., “upon a detection of an occurrence of a searching event”), using the ride request information as provided by the employer or hiring entity (i.e., the ride requestor). Each such request is an advertised job opening, position, assignment, contract, and/or project, which the individual Independent Contractor drivers can accept or decline, following receipt of a message (which is generated by the processing device and electronically transmitted to the mobile application of the Independent Contractor from the Lyft transmitter) in real-time concerning the available assignment via the Lyft Mobile Application for Drivers.</p>	Rider (Lyft Mobile Application for Riders and/or use of the Lyft web page at lyft.com)

wherein the processing device is programmed to detect the occurrence of the searching event,		None
wherein the processing device utilizes information regarding the at least one of a job opening, a position, an assignment, a contract, and a project, stored in the memory device, and	<p><u>Paragraph 57 of the First Amended Complaint</u></p> <p>57. As described above (see ¶¶ 51-55), the Lyft Accused Instrumentalities comprise servers located at data centers across the United States which include processors (i.e., “processing devices”). On information and belief, such processors are programmed to processes the information concerning the job search request in real-time (i.e., “upon a detection of an occurrence of a searching event”), using the ride request information as provided by the employer or hiring entity (i.e., the ride requestor). Each such request is an advertised job opening, position, assignment, contract, and/or project, which the individual Independent Contractor drivers can accept or decline, following receipt of a message (which is generated by the processing device and electronically transmitted to the mobile application of the Independent Contractor from the Lyft transmitter) in real-time concerning the available assignment via the Lyft Mobile Application for Drivers.</p>	Lyft
further wherein the processing device generates a message containing information regarding at least one of a job opening, a position, an assignment, a contract, and a project , wherein the message is	<p><u>Paragraph 57 of the First Amended Complaint</u></p> <p>57. As described above (see ¶¶ 51-55), the Lyft Accused Instrumentalities comprise servers located at data centers across the United States which include processors (i.e., “processing devices”). On information and belief, such processors are programmed to processes the information concerning the job search request in real-time (i.e., “upon a detection of an occurrence of a searching event”), using the ride request information as provided by the employer or hiring entity (i.e., the ride requestor). Each such request is an advertised job opening, position, assignment, contract, and/or project, which the individual Independent Contractor drivers can accept or decline, following receipt of a message (which is generated by the processing device and electronically transmitted to the mobile application</p>	Lyft

responsive to the job search request; and	of the Independent Contractor from the Lyft transmitter) in real-time concerning the available assignment via the Lyft Mobile Application for Drivers.	
wherein the message is responsive to the job search request; and		None
a transmitter for transmitting the message to a communication device associated with an individual,	<p><u>Paragraph 57 of the First Amended Complaint</u></p> <p>57. As described above (see ¶¶ 51-55), the Lyft Accused Instrumentalities comprise servers located at data centers across the United States which include processors (i.e., “processing devices”). On information and belief, such processors are programmed to process the information concerning the job search request in real-time (i.e., “upon a detection of an occurrence of a searching event”), using the ride request information as provided by the employer or hiring entity (<i>i.e.</i>, the ride requestor). Each such request is an advertised job opening, position, assignment, contract, and/or project, which the individual Independent Contractor drivers can accept or decline, following receipt of a message (which is generated by the processing device and electronically transmitted to the mobile application of the Independent Contractor from the Lyft transmitter) in real-time concerning the available assignment via the Lyft Mobile Application for Drivers.</p>	Lyft
wherein the message is transmitted to the communication device in real-time.	<p><u>Paragraph 57 of the First Amended Complaint</u></p> <p>57. As described above (see ¶¶ 51-55), the Lyft Accused Instrumentalities comprise servers located at data centers across the United States which include processors (i.e., “processing devices”). On information and belief, such processors are programmed to process the information concerning the job search request in real-time (i.e., “upon a detection of an occurrence of a searching event”), using the ride request information as provided by the employer or hiring entity (<i>i.e.</i>, the ride requestor). Each such request is an advertised job opening, position, assignment, contract, and/or project, which the individual Independent Contractor drivers can accept or decline, following receipt of a message (which is generated</p>	Driver (Lyft Mobile Application for Drivers)

	by the processing device and electronically transmitted to the mobile application of the Independent Contractor from the Lyft transmitter) in real-time concerning the available assignment via the Lyft Mobile Application for Drivers.	
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